

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ETHLOKIA PLUMBER, ex rel., K.W.

Plaintiffs,

v.

HARRIS COUNTY DEPARTMENT
OF EDUCATION,

Defendant.

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CIVIL ACTION NO. 4:20-CV-00672

DECLARATION OF ETHLOKIA PLUMBER

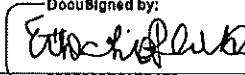
I, Ethlokia Plumber, hereby declare as follows:

1. I am the parent of K.W. My son is 17 years old. In 2018, he was eligible for special education as a student with Attention Deficit Hyperactivity Disorder and a Specific Learning Disability.
2. Attached to my declaration is a true and correct copy of a letter I received from the Texas Department of Family and Protective Services dated August 22, 2018. The letter states that DFPS's found "reason to believe" that Herbert Allen committed physical abuse against K.W.
3. I took K.W. to the hospital the date he was abused by Herbert Allen, and he was diagnosed with a broken collarbone.
4. K.W. continues to suffer from the abuse. He suffers from headaches and seizures from the head injury.
5. After the incident, K.W. was unable to return to school that year, and was placed on homebound instruction. He only received four hours of academic instruction per week.

6. K.W. has been diagnosed with Post-Traumatic Stress Disorder since the incident. He has more difficulty interacting with people, and quickly becomes defensive when people come into close contact with him.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 3rd day of June 2021, at Houston, Texas.

DocuSigned by:

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Ethlokia Plumber